

**LOCAL BANKRUPTCY FORM 9014-3  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Shirley M Upshur

Debtor(s)

CHAPTER 13

Toyota Motor Credit Corporation

Movant

VS.

NO. 19-14577 MDC

Shirley M Upshur

Debtor(s)

William C. Miller Esq.

Trustee

11 U.S.C. Section 362

**NOTICE OF MOTION, RESPONSE DEADLINE**  
**AND HEARING DATE**

Toyota Motor Credit Corporation has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **September 3, 2019** you or your attorney must do all of the following:

- (a) file an answer explaining your position at:  
United States Bankruptcy Court  
Robert N.C. Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:  
Rebecca A. Solarz, Esquire  
KML Law Group, P.C.  
Suite 5000 – BNY Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D.

Coleman, the United States Bankruptcy Judge, in Courtroom 2 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on, **September 17, 2019 at 10:30am** or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed an answer.

**/s/Rebecca A. Solarz, Esquire**

Rebecca A. Solarz, Esquire

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August 19, 2019